

Amy J. Oliver (Utah #8785) (admitted *pro hac vice*)
OliverA@sec.gov
Daniel J. Wadley (Utah #10358) (admitted *pro hac vice*)
WadleyD@sec.gov
James J. Thibodeau (Utah #15473) (admitted *pro hac vice*)
ThibodeauJ@sec.gov
Attorneys for Plaintiff
Securities and Exchange Commission
Salt Lake Regional Office
351 South West Temple
Suite 6.100
Salt Lake City, UT 84101-1950
Tel.: (801) 524-5796
Fax: (801) 524-3558

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

HEMP, INC. a Colorado Corporation;
BRUCE J. PERLOWIN, an individual; BARRY
K. EPLING, an individual; JED M. PERLOWIN,
an individual; FERRIS HOLDING, INC., a private
Nevada Corporation; HOBBS EQUITIES INC., a
private Nevada Corporation; DIVERSIFIED
INVESTMENTS LLC, a private Nevada Limited
Liability Company; and QUANTUM ECONOMIC
PROTOCOLS LLC, a private Nevada Limited
Liability Company.

Defendants.

Case No. 2:16-cv-1413 JAD-PAL

**JOINT STIPULATION FOR
PROTECTIVE ORDER**

WHEREAS, disclosure and discovery activity in the action entitled *SEC v. Hemp, Inc., et al.*, 2:16-cv-1413 JAD-PAL, currently pending in the United States District Court, District of Nevada, will likely involve production of confidential, proprietary, and/or personally identifiable information for which protection from use for any purpose other than prosecuting or defending this litigation is warranted.

ACCORDINGLY, Plaintiff Securities and Exchange Commission (the “Commission”) and Defendants Hemp, Inc., Bruce J. Perlowin, Barry K. Epling, Jed M. Perlowin, Ferris Holding, Inc., Hobbes Equities, Inc., Diversified Investments, LLC, and Quantum Economic Protocols, LLC, through their respective counsel, hereby stipulate to and petition the Court to enter the following Stipulated Protective Order.

1. **DEFINITIONS**

1.1 Party: any party to this action, including all of its officers, employees, attorneys, consultants, retained experts, and support staff.

1.2 Discovery Material: all items or information, regardless of the medium or manner generated, stored, or maintained (including, among other things, Fed. R. Civ. Proc. 26 disclosures, testimony, transcripts, or tangible things) produced by a Party in discovery in the course of this litigation, whether voluntarily or in response to a request for production of documents pursuant to Fed R. Civ. Proc. 34, that are not otherwise publicly available.

1.3 Receiving Party: a Party that receives Discovery Material from a Producing Party.

1.4 Producing Party: a Party that produces Discovery Material in this action.

2. SCOPE

The protection conferred by this Joint Stipulation For Protective Order covers not only Discovery Material (as defined above), but also any information copied or extracted there from, as well as all copies, excerpts, summaries, or compilations thereof that might reveal Discovery Material. The Parties agree to stamp or otherwise mark Discovery Material with the term “Confidential”.

3. DURATION

Even after termination of this litigation, the confidentiality obligations imposed by this Joint Stipulation For Protective Order shall remain in effect until a Producing Party agrees otherwise in writing or a court order otherwise directs.

4. ACCESS TO AND USE OF DISCLOSURE OR DISCOVERY MATERIAL

4.1 The Parties agree not to disclose Discovery Material received from a Producing Party, other than for purposes related to this litigation.

4.2 The Parties agree that Discovery Material received from a Producing Party may be used for purposes related to this litigation, including use in depositions in this litigation, use in connection with expert witnesses and consultants, and may be submitted and/or referenced in filings and arguments made to the Court in this case.

4.3 Nothing in this Joint Stipulation For Protective Order shall alter the Parties’ obligations under Federal Rule of Civil Procedure 5.2.

4.4 The Parties agree that no Party shall disclose Discovery Material for purposes not related to this litigation, including disseminating or disclosing Discovery Material to the media, making such information available to the public and/or posting such information on the internet. Notwithstanding this paragraph, nothing in this Joint Stipulation For Protective Order shall

restrict the dissemination of any document which is publicly available by virtue of being filed with the Court in the course of this litigation.

4.5 The Parties agree to redact personally identifiable information from all Discovery Material electronically filed with the Court in this case as required by LR IC 6-1. The Parties may file Discovery Material with the Court under seal as permitted by LR IA 10-5.

4.6 Disclosure of “Disclosure or Discovery Material” by the Commission. Notwithstanding the above paragraphs, nothing in this Joint Stipulation For Protective Order shall be construed to limit or otherwise abrogate the Commission’s ability to makes its files available as described in the “Routine Uses of Information” section of SEC Form 1662, a copy of which is attached hereto as Exhibit A, or to comply with any other statutory obligation. The Commission may disclose Discovery Material in a manner consistent with the “Routine Uses of Information” section of SEC Form 1662 or to comply with any other statutory or regulatory obligation without notifying or seeking permission from the Producing Party.

IT IS SO STIPULATED.

Dated: October 18, 2016

s/Amy J. Oliver
Amy J. Oliver
Daniel J. Wadley
James J. Thibodeau
Attorneys for Plaintiff
Securities and Exchange Commission

Dated: October 18, 2016

s/Jonathan D. Bletzacker
Brent R. Baker
Jonathan D. Bletzacker
Attorney for Jed Perlowin, Diversified Investments
LLC, Quantum Economic Protocols LLC

Dated: October 18, 2016

s/ Timothy J. Coley

Thomas A. Sporkin

Timothy J. Coley

Attorney for Bruce Perlowin, Hemp Inc., Barry
Epling, Ferris Holding, Inc., Hobbes Equities Inc.

IT IS SO ORDERED.



HONORABLE PEGGY A. LEEN
UNITED STATES MAGISTRATE JUDGE

DATED: October 24, 2016